REMARKS

Claims 1, 8, and 12 have been amended. Claims 1-20 are pending. Applicant reserves the right to pursue the original claims and other claims in this application and in other applications.
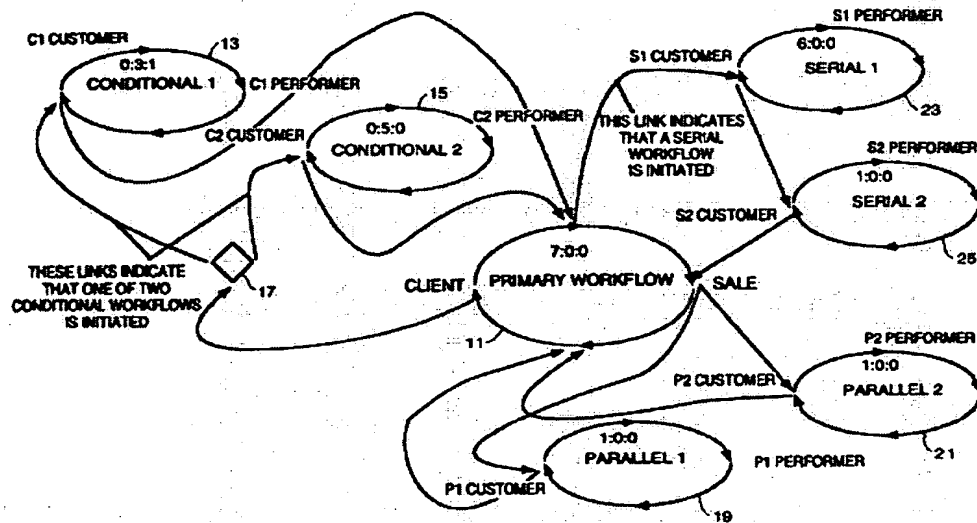
Claims 1, 8 and 12 stand objected to based on informal matters. Claims 1, 8 and 12 have been amended. The concerns raised in the Office Action have been addressed by the amendments to claims 1, 8 and 12. Accordingly, Applicant respectfully submits that the objection should be withdrawn and the claims allowed.

Claims 1-4 and 6, 7 and 12-20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Flores. The rejection is respectfully traversed.
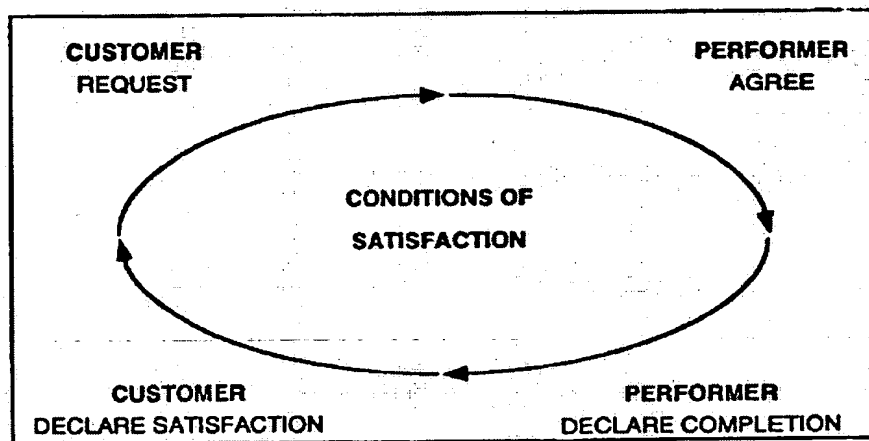
Claim 1 recites a method for creating a workflow process management application. The "workflow process management application, when executed by said computer, permits a user to: enter, for each department, a workflow plan for said department, receive a workflow performed by departments of said organization, and create a report comparing said workflow plan with said workflow performed." According to claim 1, "said workflow plan comprises a plurality of standards, each one of said standards inter-relating at least one activity object with at least one resource object as a function of time and skill level." Applicant respectfully submits that Flores fails to disclose the claimed invention.

Flores, by contrast, relates to a "workflow application builder" and is directed towards creating workflow and/or business maps. Flores Col. 2, l. 65 to Col. 3, l. 6. Flores repeatedly refers to its invention in terms of workflow and process maps. Figure 2A of Flores, reproduced on the next page, illustrates the maps created by the Flores workflow application builder. As shown, a primary workflow is linked to

secondary workflows (labeled "serial" or "parallel") which are designed to map out

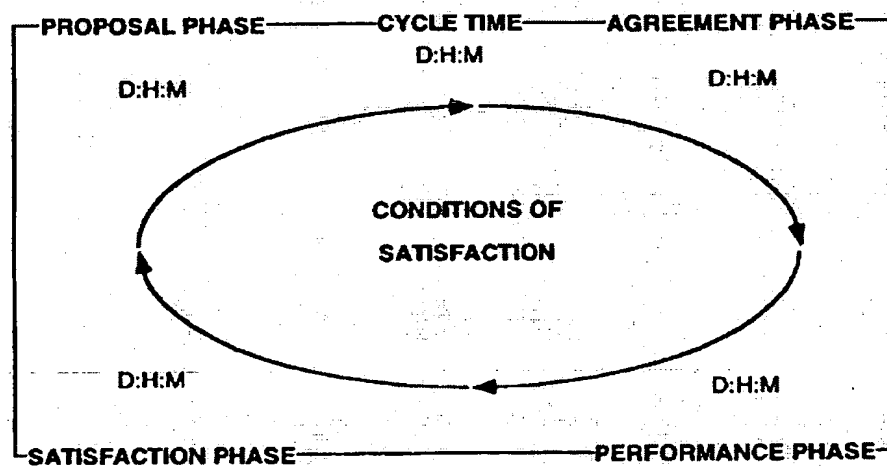transactions (i.e., "sales") between customers and performers.

According to Flores, these workflows are negotiated between the customer

and performer during different phases of the Flores workflow loop. Flores Col. 3, l. 56

to Col. 4, l. 9. The four phases are illustrated by Flores Figure 1b (reproduced below).

The Office Action equates the Flores workflow loops and some of the Flores variables, such as "cycle time" as the claimed invention's standards. Applicant respectfully submits, however, that Flores fails to disclose, teach or suggest "standards inter-relating at least one activity object with at least one resource object as a function of time and skill level" as required by claim 1. Initially, Applicant notes that Flores never contemplates, discloses or suggests inter-relating activities to resources based on "skill." Flores relates solely to negotiated transactions. The actual skill or skill level of the resource and/or the skill required for a transaction is never disclosed, nor contemplated in the Flores system (where all of the transactions are negotiated before hand).

Moreover, Flores does not inter-relate activities to resources based on time. The Flores "cycle" time, refers to a negotiated time for completion of a workflow from the initial proposal stage to the final satisfaction (i.e., acceptance by the customer) stage. This cycle time also includes time required to negotiate the transaction (i.e., proposal and agreement phases). Flores Col. 8, l. 65 to Col. 9, l. 4. This is evident from Flores Figure 1e, reproduced below.

The workflow plan of the present invention, by including a plurality of standards for inter-relating activities and resources (for performing activities) to each other as a function of time <u>and</u> skill, is therefore significantly different from anything taught or suggested by Flores. This important aspect of the claimed invention permits work to be appropriately planned in advance. For example, the workflow plan of the invention permits a user of the workflow management application to determine whether there are sufficient workers with the needed skills to perform the expected work. This feature is not disclosed or suggested by Flores at all.

Claim 1 also recites that "said workflow process management application, when executed by said computer, permits a user to: enter, for each department, a workflow plan for said department, receive a workflow performed by departments of said organization, and create a report comparing said workflow plan with said workflow performed." Thus, the claimed invention is also directed to setting, for each department of an organization, a planned workflow, and then comparing the planned worked with the actual workflow performed. "Workflow" refers to both work (i.e., activities) that must be performed as well as the resources required to perform the work. In this manner, a user of the claimed invention can generate reports to determine productivity.

Flores, on the other hand, discloses the "<u>observation</u> of status of current transactions as well as history and performance of past transactions." Flores Col. 6, ll. 27-31. Flores also mentions, without further explanation, "status reports." Flores Col. 71, ll. 4-9. Applicant respectfully submits that the Flores status observations and reports are not the same thing as a report comparing planned work with the actual work performed. It is unclear what Flores considers to be "status" information, but Applicant respectfully submits that nothing in the Flores patent relates to "comparing

said workflow plan with said workflow performed." This is one more reason why the claimed invention is allowable over Flores.

Accordingly, Applicant respectfully submits that claim 1 is allowable over Flores. Claims 2-4 and 6-7 depend from claim 1 and are allowable along with claim 1 for at least the reasons set forth above and on their own merits.

Claim 12 recites an apparatus for creating a workflow process management application. The claim 12 "workflow process management application permits a user to enter, for each department, a workflow plan for said department, create a report corresponding to planned workflow and expected needs, receive a workflow performed by said organization, and create a report comparing said workflow plan with said workflow performed to determine workflow productivity." Applicant respectfully submits that Flores fails to disclose the claim 12 invention.

As set forth above, Flores merely discloses observing the status of a transaction via status reports. Flores does not elaborate what these status reports contain. Flores does not disclose or suggest the ability to generate "a report corresponding to planned workflow and expected needs" or the ability to "create a report comparing said workflow plan with said workflow performed to determine workflow productivity." Because Flores is silent with respect to these matters, Applicant respectfully submits that Flores fails to disclose the claim 12 invention. Claims 13-20 depend from claim 12 and are allowable along with claim 12 for at least the reasons set forth above and on their own merits.

Applicants respectfully submit that the rejection should be withdrawn and the claims allowed.

DSMDB.1973596.1

Claims 5 and 8-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Flores. The rejection is respectfully traversed.

Claim 5 depends from claim 1. Applicant respectfully submits that claim 5 is allowable along with claim 1 for at least the reasons set forth above and on its own merits.

Claim 8 recites a computer readable medium that causes a computer to automatically generate a workflow process management application from department objects, resource objects, and activity objects. The "workflow process management application permits said user to enter, for each department, a workflow plan for said department, receive a workflow performed by departments of said organization, and create a report comparing said workflow plan with said workflow performed." According to claim 8, "said workflow plan comprises a plurality of standards, each one of said standards inter-relating at least one activity object with at least one resource object as a function of time and skill level."

Applicants respectfully submit that claim 8 is allowable over Flores for at least the reasons set forth above with respect to claim 1. Claims 9-11 depend from claim 8 and are allowable along with claim 8 for at least the reasons set forth above and on their own merits.

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　　　　　In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Dated: September 7, 2005　　　　　　　　Respectfully submitted,

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